

## **APPENDIX B: File Review**

The file review part consisted of review of each of the following type of permits: a PSD permit with a BACT analysis, a netting permit, a permit with public interest, a nonattainment NSR permit and a synthetic minor permit. The choice of the permits was at IDEM's discretion, and the permits chosen were:

- A. Waupaca Foundry (PSD permit)
- B. Lehigh Cement (netting permit)
- C. Superior Aluminum Alloys (public interest permit)
- D. Whiting Clean Energy (nonattainment NSR permit)
- E. GM Bedford (synthetic minor permit)

### **Files Summary**

#### **A. Waupaca Foundry (permit number 123-12948)**

Waupaca Foundry is an example of a PSD permit issued by IDEM. The state's Waupaca file contains the permit application from the source (including general forms, a narrative describing the project, and emission calculations), extensive communication letters between the source and IDEM, and IDEM's BACT analysis form. The file also includes a public notice procedure checklist and an administrative checklist with key contacts (including the Federal Land Manager). The file was not limited to documents from this permitting action and included inspection reports, malfunction reports, COM reports, violation letters, and FESOP quarterly emission reports.

#### **B. Lehigh Cement (permit number 093-15822)**

Lehigh Cement is an example of a permit issued by IDEM that relies on net emission credits to avoid PSD. The state's Lehigh Cement file contains the source's permit application, the draft permit, the final permit, and other permits issued to this source. The file also included a public notice procedure checklist. The file was not limited to documents from this permitting action and included malfunction reports, excess emission reports, Title V compliance certifications, inspection reports, and operation and maintenance plans. During the review, USEPA was unable to find any documents that helped clarify the source's net emissions history.

#### **C. Superior Aluminum Alloys (permit number 003-11927)**

Superior Aluminum Alloys is an example of a permit issued by IDEM that generated significant public interest. The state's permit file contains the source's permit application, the draft permit and the final permit. The file contained a checklist of government officials notified of this project and a list of affected parties. Also included in the file were public comment documents from the city of New Haven, Indiana.

**D. Whiting Clean Energy (permit number 089-11194)**

Whiting Clean Energy is an example of a nonattainment NSR permit issued by IDEM. The state's permit file contains the final permit and various emissions calculations. The permit includes conditions requiring specific shutdowns from other (specified) sources in order to generate NSR offset credits. The file includes a letter from the source to IDEM informing the state that VOC offset credits have been exchanged between the sources involved and a letter from NiSource regarding potential NOX credit transfers to Whiting Clean Energy. The file also includes public notification documents, a list of interested parties, acid rain documents, and a notice of deficiency letter.

**E. GM Bedford (permit number 093-13639)**

GM Bedford is an example of a synthetic minor permit issued by IDEM. The state's permit file contains the source's permit application, the draft permit, and the final permit. The file includes letters from the source to IDEM regarding this proposed project and the source's comments on the draft permit. Also included are a public notice checklist and IDEM inspection reports for this source.